Federal Communications Commission

Electronic Comment Filing
Proceeding: 25-133
Subject: In Re: Delete, Delete, Delete

Submitted by:
Sporton International (USA) Inc. **Date: April 09, 2025**

Sporton International (USA) Inc. (“Sporton”), an ISO/IEC 17025 and ISO/IEC 17065 accredited testing laboratory and recognized Telecommunication Certification Body (TCB) pursuant to FCC Rule Section 2.960, respectfully submits the following comments for the Commission’s consideration. These are informed by over three decades of global experience navigating equipment authorization processes and securing Grants of Equipment Authorization across the Wireless, Cellular, and Information Technology industries.

1. Section 1.1307(b)(2): Definition of RF Source

The current definition encompasses both intentional and unintentional emitters of radiofrequency (RF) energy. Based on the presentation delivered by Alfonso Tarditi at the April 2023 TCB Council Workshop, it was clarified that unintentional radiators (URS) are unlikely to emit radiated power exceeding 1 mW, except in rare scenarios involving devices with extremely low-frequency coils (sub-100 kHz).

Accordingly, we propose that the Commission exclude unintentional radiators from the RF source definition as it pertains to RF exposure compliance regulations for wireless/intentional transmitters.

2. Section 15.203: Antenna Requirements

This provision restricts intentional radiators from being used with any antenna other than the one supplied by the responsible party, using unique or permanent attachments to ensure compliance.

This restriction introduced approximately three decades ago, originally sought to prevent users from easily replacing antennas with

unauthorized variants (e.g., from Radio Shack). However, in the modern era, a wide array of antenna connectors are readily available online, rendering this restriction obsolete.

We recommend repealing Section 15.203. Section 15.21 already offers a sufficient safeguard, stating that unauthorized modifications by users could void their right to operate the equipment, which effectively serves the same compliance function.

3. Form 731 Revisions

The Technical and Non-Technical Contact fields on Form 731 are now functionally obsolete.

We propose the following amendments:

- Replace the Non-Technical Contact section with the designated U.S. Agent for service of process.
- Eliminate the Technical Contact section altogether.

4. Equipment Authorization System (OET-EAS): System Enhancements

We advocate for the following improvements to the OET-EAS filing system:

Delete Equipment Class definitions; certifying the device based upon FCC Rule Parts.

Or

- Enable a single upload action by TCBs to apply identical documentation (e.g., FCC ID label, schematics, internal/external photos, user manuals, cover letters, attestation letters) across multiple Equipment Classes under the same FCC ID.
- Enhance system efficiency and reduce risk of clerical errors.
- Integrate the U.S. agent for service of process into the public search interface (by name and/or FRN).
- Upgrade the Knowledge Database (KDB) search engine utilizing artificial intelligence capabilities.

5. Market Surveillance Activities

Currently, the 5% market surveillance quota is calculated per Equipment Class based on the number of Form 731a Grants issued.

We propose recalculating the 5% threshold on a per FCC ID application basis—including original applications, Class II/III permissive changes, and Change-in-ID requests.

Furthermore, we recommend the following procedural upgrades:

- Enable TCBs or the FCC to generate Market Surveillance Sample Request letters directly from the OET-EAS system.
- Assign and track each surveillance activity using a unique identifier.
- Require updates to the tracking number from:
    - The Grantee (upon submission of the sample to TCB),
    - The TCB (upon completion and verdict of the sample test), and
    - The TCB again upon upload of the sample report to the FCC under the corresponding tracking ID.

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6. Equipment Authorization Procedures / Part 2 subpart J.

We urged FCC continue Equipment Authorization Procedure as prescribed in Part 2 subpart J.

- Modernize the process requirements by embedded latest data analytic
- Redesign OET-EAS to improve efficiency
- OET-EAS is the Single Source of Truth which are widely trusted by Global Regulatory Authorities. FCC certified devices are recognized by at least 76 countries. FCC OET-EAS is the only authoritative source of data contain all technical reports which can be accessible by general public and worldwide regulatory authorities.
- FCC grant of equipment authorization / FCC ID provides significant helps for manufacturers in obtaining Global Market Access (GMA) approval.

Sincerely,

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